

Exhibit B

IN THE CHANCERY COURT OF MONTGOMERY COUNTY, TENNESSEE

JANE DOE NO. 1 and)
JOHN DOE NO. 1 as next friend and father)
of minor plaintiff, JANE DOE NO. 1,)
) NO. DT-23-1
Plaintiff,)
v.)
)
O'REILLY AUTOMOTIVE STORES, INC.)
AND JOSEPH KARR,)
)
Defendants.)

NOTICE OF FILING OF NOTICE OF REMOVAL TO FEDERAL COURT

TO: Heather L. Moore, Clerk and Master
Montgomery County Chancery Court
2 Millennium Plaza
Suite 101
Clarksville, TN 37040

Please take notice that defendant O'Reilly Automotive Stores, Inc., by counsel, pursuant to 28 U.S.C. § 1441, *et seq.*, has filed in the United States District Court for the Middle District of Tennessee, a Notice of Removal of the above-captioned cause of action from the Montgomery County Court to the United States District Court for the Middle District of Tennessee. A copy of the Notice of Removal is attached as Exhibit 1. The basis for removal of this cause of action is diversity jurisdiction and an amount in controversy exceeding \$75,000 which places original jurisdiction over this matter with the District Court. Pursuant to 28 U.S.C. § 1446(d), the Montgomery County Chancery Court shall proceed no further on this case unless and until the case is remanded by the United States District Court for the Middle District of Tennessee.

Please promptly acknowledge receipt and filing of this Notice and the copy of the Notice of Removal in your office by completing and signing the Acknowledgment found at the bottom

of this Notice, an extra copy of which is enclosed for this purpose, with the request that it be returned when signed.

ACKNOWLEDGEMENT

I, Heather L. Moore, Clerk and Master of the Chancery Court of Montgomery County, Tennessee, do hereby acknowledge receipt of the above notice and papers referred to therein, and certify that I have on the date and hour below stated, filed the said copy of the Notice to remove this cause to the United States District Court, at Montgomery County, Tennessee, this _____ day of _____, 2023.

Clerk and Master of the Chancery Court of
Montgomery County, TN

This 27th day of March 2023.

Respectfully submitted,

LEWIS THOMASON, P.C.

By: /s/ Daniel W. Olivas _____

Daniel W. Olivas (BPR# 024641)
424 Church Street, Suite 2500
P.O. Box 198615
Nashville, TN 37219
(615) 259-1366
dolivas@lewisthomason.com

*Attorneys for defendant O'Reilly Automotive Stores,
Inc.*

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing NOTICE OF FILING OF NOTICE OF REMOVAL TO FEDERAL COURT has been served on the following counsel of record via U.S. mail to:

Jason A. Lee, Esq.
Burrow Lee, PLLC
651 S. Mt. Juliet Rd., #194
Mt. Juliet, TN 37122

This the 27th day of March 2023.

/s/ Daniel W. Olivas

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JANE DOE NO. 1 and)	
JOHN DOE NO. 1 as next friend and father)	NO. _____
of minor plaintiff, JANE DOE NO. 1)	
)	JUDGE _____
Plaintiff,)	
v.)	MAGISTRATE JUDGE
)	_____
O'REILLY AUTOMOTIVE STORES, INC.)	
AND JOSEPH KARR)	JURY DEMAND
)	
Defendants.)	

NOTICE OF FILING OF REMOVAL TO PLAINTIFF'S ATTORNEY

Notice is hereby given that defendant O'Reilly Automotive Stores, Inc., in the above-styled cause heretofore filed in the Chancery Court for Montgomery County, Tennessee, at Charlotte, Tennessee, has this day filed in the District Court of the United States for the Middle District of Tennessee, in the office of the Clerk thereof, in Nashville, Tennessee, a Notice of Removal of this cause from the state court to the District Court and have attached to the Notice of Removal the Complaint and other initial file documents. A copy of the Notice of Removal is attached hereto and served herewith.

This 27th day of March 2023.

Respectfully submitted,

LEWIS THOMASON, P.C.

By: /s/ Daniel W. Olivas

Daniel W. Olivas (BPR# 024641)

424 Church Street, Suite 2500

P.O. Box 198615

Nashville, TN 37219

(615) 259-1366

dolivas@lewisthomason.com

Attorneys for defendant O'Reilly Automotive Stores, Inc.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing NOTICE OF FILING OF REMOVAL TO PLAINTIFF'S ATTORNEY has been served on the following counsel of record via email to:

Jason A. Lee, Esq.
Burrow Lee, PLLC
651 S. Mt. Juliet Rd., #194
Mt. Juliet, TN 37122

This the 27th day of March 2023.

/s/ Daniel W. Olivas